STATE OF MICHIGAN
IN THE 54A JUDICIAL DISTRICT COURT FOR THE COUNTY OF INGHAM
Civil Division

TUNC URAZ, Inmate No. 114653,

Plaintiff,

CASE NO. 2025-05377-GC
HONORABLE: STACIA BUCHANAN

v.

JACOB ALAN PERRONE

Defendant.
_____/

DRAGON LAWYERS PC ©
Jacob A. Perrone (P71915)
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DEFENDANT JACOB A. PERRONE'S MOTION TO STRIKE AND MOTION FOR MORE DEFINITE STATEMENT AND BRIEF IN SUPPORT

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NOW COMES Defendant, ***Jacob A. Perrone***, (hereinafter "*Defendant*") by and through his attorneys, **DRAGON LAWYERS PC ©**, and *Jacob Alan Perrone, Esq.*, and for his Motion to Strike and Motion for More Definite Statement states as follows:

Defendant, ***JACOB A. PERRONE***, respectfully moves the Court to Dismiss the case and/or strike the Plaintiff's complaint in its entirety and require the Plaintiff to provide a more definite statement for Defendant to Answer. Defendant also requests $500.00 in attorney fees for having to answer this frivolous case and that sanctions be imposed against Mr. Uraz in a monetary amount

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exceeding $2,000.00 to reiterate to Mr. Uraz he is not entitled to infringe upon innocent people and the court's time with his personal vendettas and fractured reasoning.

BRIEF IN SUPPORT

Factual Background

Mr. Uraz was charged in 2017 with Aggravated Stalking and Solicitation to Commit Murder based upon a sting operation done by the Lansing Police Department ("LPD") where they used an undercover officer to act as a hired hitman. Mr. Uraz solicited for the victim to be killed by the purported hit man in a very distinct and easily understandable manner. Although, Mr. Uraz was advised by both my self and his prior retained Mr. Nichols to take a deal he allowed the idiots in jail to overtake his common sense and endeavored to "clear his name", likely so he could stalk and revictimize the victim in the solicitation case. I was contacted repeatedly by representatives of the Turkish Embassy throughout the trial, and they were very upset that I was not sharing status updates with them regarding the case and providing them with an objective viewpoint as to the merits of the case and likely outcomes. As Mr. Uraz's appointed counsel, I made the judgment call that it would not be in the best interest of Mr. Uraz to disclose evidence and work product regarding the case because not only would it potentially sacrifice merited arguments, but it likely would have led to the Turkish government turning its back on Mr. Uraz.

I want to be extremely clear on the record that regardless of his brother's standing in Turkey I welcome further attacks on my character and professionalism and he is free to stalk me if he so chooses. But I must warn Mr. Uraz that he is wading in water over his or his brother's head and my last stalker left me alone after 4 months because he had had enough and came to terms with the likelihood of retribution if he continued. Mr. Uraz is not my first stalker, but he may be my last. And yeah, that is a threat.

Legal Authority and Analysis

Rule 2.115. Motion to Correct or to Strike Pleadings.

(A) Motion for More Definite Statement. If a pleading is so vague or ambiguous that it fails to comply with the requirements of these rules, the opposite party may move for a more definite statement before filing a responsive pleading. The motion must point out the defects complained of and the details desired. If the motion is granted and is not obeyed within 14 days after notice of the order, or within such other time as the court may set, the court may strike the pleading to which the motion was directed or enter an order it deems just.

(B) Motion To Strike. On motion by a party or on the court's own initiative, the court may strike from a pleading redundant, immaterial, impertinent, scandalous, or indecent matter, or may strike all or part of a pleading not drawn in conformity with these rules.

In *Belle Isle Grill Corp v City of Detroit*, 256 Mich App 463, 666 NW2d 271 (2003) the trial court granted defendants' motion to strike several counts and combine others, plaintiff's argument that defendant used motion to strike to test pleadings' legal sufficiency was unwarranted because defendant sought to strike claims as redundant. Plaintiff's complaint in this manner is rambling disorganized and appears to be devoid of legal claim or merit. It is a jumbled and disjointed conspiracy theory. If Plaintiff were realistically intent on addressing his qualms, he should start with the video of the three-week trial that precipitated and was underlying any mental health issues that occurred subsequent to the conclusion of the trial.

If I was incompetent or mentally ill to the extent that it would have impacted my performance during the grueling, contentious, and extremely emotion it would be objectively verifiable by the video of my performance at the trial. And while this attempt at forwarding a claim is obviously precluded by the Defendant's own allegations that he had a similar case dismissed previously in the 29th Circuit Court, I will allow Mr. Uraz the ability to provide a more definite statement in the interest of fairness and the comity of nations. I want to make sure that Mr. Uraz's brother and family have full access to

all the protections incorporated in the American Justice System. Turkey's justice system is more advanced and progressive than the US system regarding the death penalty, but I can only imagine the life he would lead in a Turkish prison if he was convicted on the same charges. By way of further argument, he would be banished and exiled by his family because of the negative implications his actions would have on them.

Whereas I vociferously disagree with Judge Buchanan's characterization of me as it relates to the allegations in this matter, I represent that I respect her both as a judge and a person and fully understand why she made her ruling. I knew the Judge when she was still an attorney and she was a hell of an attorney, one of the best in the area. I believe it is more of an attestation to the unreliable and since debunked theories and misinformation posited to Judge Buchanan in a frantic effort to avoid the appearance of impropriety by an inexperienced and self-interested young lawyer. I appreciate the unwitting nature of the representations that were made to the Court about me and while it initially was difficult to swallow because of the horrific stigma associated with mental illness, I have since moved past this and wish everyone associated with that case the best.

This was an egregious aggravated stalking case where the Defendant tracked his victim and even showed up randomly at a Dave and Busters in Novi and interrupted a date she was on. He stalked her through the internet, and he stalked her in a multitude of other ways that was presented against him at the trial. The people thought it would be a three-day trial, but the trial stretched out nearly three weeks because of my associates and my diligence, preparation, and commitment to providing Mr. Uraz the best defense. While I was lead chair, Mr. Fernandez and Mr. Schroeder spent countless hours and time to perfect every element of the presentation of the case and participated in questions some of the witnesses strategically.

I have been through the Michigan Attorney Grievance Commission ("AGC") based on this incident and all incidents alleged regarding my mental health and treatment. I have testified in a Ginther hearing and been cross-examined by his appellate attorney regarding any potential underlying pathology that would have limited my ability to appropriately and zealously represent his interests at trial. Mr. Uraz had a bipolar son that lived in Turkey who was possibly going to the state because of his mother's severe bipolar disorder, and we ran numerous hearings, some evidentiary in nature featuring his sister who had traveled from Turkey, to attempt to get Mr. Uraz back to Turkey pending the outcome of the case given the exigent circumstances. Defendant's requests were all denied, likely because of the gravity and egregious nature of Mr. Uraz as to stalking and videotaped attempt to hire a hit man to "take out the trash". It should be noted that Mr. Uraz was talked out of testifying on his own behalf because his testimony was mainly going to be that by take out the trash, he meant the undercover officer posing as a hitman would take his neighbors trash out because she was elderly and he had always done that for her.

I listed about 40 witnesses at Mr. Uraz's direction, most of which were stricken as irrelevant or frivolous. I also filed I believe 3 motions, and one was a motion to change venue because of the relatively limited media coverage but Mr. Uraz insisted so his argument was preserved for appeal. An allegation of a Brady violation was also forwarded because the prosecutor failed to timely turn over witness statements from other inmates that were housed with the Mr. Uraz and his jail snitches in administrative segregation. Mr. Uraz was placed in administrative segregation because he violated probation on an earlier stalking case by stalking the victim again and also stalked her from the jail.

Now, Mr. Uraz disparages my name and likely has the full support of his brother who at the time of trial was the Turkish Ambassador to Russia and since then has been named the Turkish Representative to the Organization of Islamic Nations ("OIC"), which is similar to the North Atlantic

Treaty Organization ("NATO") in the middle east. Mr. Uraz is solely attempting to create an issue because the appeals court didn't rule in his favor on the Brady violation. This trial, because of the effective nature of the defense, caused the jail to change their policy regarding inmates having police reports in their possession because case jumping was exposed in its most basic form.

Conclusion

Defendant, Jacob A. Perrone, hereby requests that this court either dismiss the matter in its entirely sua sponte as that appears appropriate or Stike the salacious, redundant, and unnecessary complaint that does nothing more than expose civilians to potential harm personal and professionally based on unfounded and attenuated allegations that lack any substance or relevance to any claims or defenses Mr. Uraz could make in the solicitation case or here in his case in chief. After striking the complaint allow Mr. Uraz 14 days to provide a more definite statement so Defendant can appropriately answer to the claims. Allowing this case to stand is a usurpation of the rights of many and invalidate the strictures and foundations of the criminal justice system in America. Mr. Uraz's brother is not bigger than the constitution and he is not bigger than the rule of law. I anticipate that his brother will pull any support for him after he is made aware of all his misgivings and continued behaviors that may negatively impact his brother's standing in the Turkish government and/or social circles. That, also a threat.

Have the Turkish Embassy call me. They have my number. Just don't send that last arrogant pretentious prick who called before. He knows I won't talk to him anyways. Do your time Tunc. Pay your debt to society, get out, and quit imposing your personal problems on innocent and unwitting others. I will be your last stalkee, if it is the last thing I accomplish in a career full of accolades and achievement. Your move Tunc. Choose wisely. And learn appropriate sentence structure if you're going to keep filing lawsuits against me.

I believe they have a law library at Thumb. Which is 1 level above the most minimum security of prisons in Michigan. I got people in Level V looking at me Tunc. Walk away. I defended you vehemently because I assessed your character and found you to be somewhat pleasant at times and conversant. My assessment of you was that you were not violent or dangerous. Misunderstood, emotionally troubled, and frankly a large dose of self-entitled, yes. Frankly, you don't have it in you. Don't play around with people who do. If they sent me to prison, I'd be a level 5, and I would spend my time in administrative segregation because I don't play well with others trying to take advantage of me and when placed in a box, I get uneasy. If what you want is an international issue, it won't happen. You're not important enough. Keep going down this road and you may learn of my importance, and the Turkish government is the least of my concerns. They are all the way in Turkey.

And I could have answered with a simple motion to dismiss on legal grounds but in the interest of the justice that I so painstakingly uphold, I leave the progression of this case to the discretion of the Court.

Respectfully submitted,

DRAGON LAWYERS PC ©

Dated: September 26, 2025

/s/Jacob A. Perrone

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PROOF OF SERVICE

The undersigned certifies that the foregoing instrument was served on September 26, 2025, via Mi-File and US Mail herein at their respective addresses as disclosed on the pleadings and to Tunc Uraz, Inmate No. 114653, at Thumb Correctional Facility, 3225 John Conley Dr., Lapeer, MI 48446. I declare that the statements above are true to the best of my knowledge, information and belief.

/s/ Jacob A. Perrone